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Attorneys for Plaintiff Anchor Holdings
Limited

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

ANCHOR HOLDINGS LIMITED, an
English Limited Company,

Plaintiff,

v.

UPPER EAST SIDE SUITES LLC, a
Delaware Limited Liability Company,
BENEDETTO CICO, an individual,
and CARLA CICO, an individual.

Defendants.

**CASE NO. 2:15-cv-05447-MMM-
FFM**

**DECLARATION OF JAMES B.
SAYLOR IN SUPPORT OF
PLAINTIFF'S RESPONSE TO
ORDER TO SHOW CAUSE**

*[Request for Entry of default and
[Proposed] Default by Clerk filed
concurrently herewith]*

I, James B. Saylor, declare and state as follows:

1. I am a member of the Bar of the State of New York, admitted *pro hac vice* to the bar of this Court for the above-entitled action. I am an associate of the law firm of Kelley Drye & Warren LLP ("Kelley Drye"), counsel for Plaintiff Anchor Holdings Limited ("Plaintiff" or "Anchor"). I have personal knowledge of all matters stated herein, and, if called as a witness, could and would testify competently thereto.

1 2. Plaintiff filed its Complaint in the above-captioned action on July 17,
2 2015. Thereafter, on August 12, 2015, Plaintiff effectuated service on Defendants
3 Upper East Side Suites LLC (“UESS”) and Benedetto Cico of the following
4 documents: Summons in a Civil Action and Complaint; Waiver of the Service of
5 Summons; Notice to Parties of Court-Directed ADR Program; Certification and
6 Notice of Interested Parties (Local Rule 7.1-1). A true and correct copy of the
7 Proofs of Service for both UESS and Benedetto Cico is attached hereto as Exhibit
8 A.

9 3. Defendant Carla Cico is an individual who resides in Verona, Italy.
10 *See* Complaint, ¶ 15. As counsel for Plaintiff, Kelley Drye engaged a third-party
11 service provider, APS International, Ltd. (“APS”) to effect service of process upon
12 Carla Cico in accordance with the Hague Convention on the Service Abroad of
13 Judicial & Extrajudicial Documents in Civil or Commercial Matters and any
14 relevant treaties.

15 4. APS has informed Anchor that following translation of the papers into
16 Italian, APS took the necessary steps to deliver the Summons and Complaint and
17 related documents to the Italian government on September 14. APS has further
18 informed Anchor that it is not in control of how quickly the Italian government
19 processes and serves these papers. In APS’ experience, it can take several weeks for
20 Italian officials to effect service pursuant to international treaty law. Following this,
21 APS advised that Italian government officials could take several more weeks to
22 complete proof of service and return that documentation to the United States. APS’
23 best, and most hopeful, estimate date for receipt of proof of service upon Carla Cico
24 is sometime in November 2015.

1 I declare under penalty of perjury under the laws of the State of California
2 and the United States that the foregoing is true and correct.
3
4

5 DATED: September 28, 2015

By //s// James B. Saylor
James B. Saylor (admitted *pro hac vice*)
KELLEY DRYE & WARREN LLP

7 Attorneys for Anchor Holdings, Ltd.
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